

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (PHILADELPHIA)**

| | |
|----------------------------|-------------------------------|
| IN RE: | : Case No. 16-16726-sr |
| | : |
| HARRY SHABOIAN, JR. | : Chapter 13 |
| SHARON SHABOIAN | : |
| DEBTORS | : |
| | : |
| | : |

**STIPULATION TO WITHDRAW MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

WHEREAS, on May 24, 2017, Wilmington Savings Fund Society, FSB, as Trustee of Stanwich Mortgage Loan Trust A ("WSFS"), filed its Motion for Relief from the Automatic Stay against the Debtors with respect to the real property located at 2421 South Lambert Street, Philadelphia, PA 19145;

WHEREAS, on June 2, 2017, the Debtors filed a response to the motion for relief stating that they are current on their post-petition adequate protection payments to WSFS; and

WHEREAS, after discussions between counsel for the parties, and WSFS' re-review of its internal records concerning the Debtors' payment history, WSFS has determined that the Debtors are in fact current on their post-petition adequate protection payments to WSFS.

NOW THEREFORE, intending to be legally bound, the parties, by and through their unsigned counsel, hereby agree that WSFS' Motion for Relief from the Automatic Stay shall be withdrawn without prejudice pursuant to the accompanying Order.

/s/ Joel S. Todd, Esquire
Joel S. Todd, Esquire
Shelton, Harrison & Pinson, PLLC
212 West Gay Street
West Chester, PA 19380
P: 484-483-4957

*Attorney for Wilmington Savings Fund
Society, FSB, as Trustee of Stanwich
Mortgage Loan Trust A*

/s/ Brad J. Sadek, Esquire
Brad J. Sadek, Esquire
Sadek and Cooper
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The Philadelphia Building
Philadelphia, PA 19107
P: 215-545-0008

Attorney for the Debtors

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CERTIFICATE OF SERVICE

I, Joel S. Todd, Esquire, hereby certify that on the date set forth below, I caused a true and correct copy of the foregoing Stipulation to Withdraw Motion for Relief from Stay, with accompanying proposed Order, to be served upon the all of the relevant parties identified below via the Court's electronic notification system.

Brad J. Sadek, Esquire
Sadek and Cooper
1315 Walnut Street, Suite 502
Philadelphia, PA 19107
Attorney for the Debtor

Chapter 13 Trustee
Frederick L. Reigle
2901 St. Lawrence Avenue
P.O. Box 4010
Reading, PA 19606

United State Trustee
Office of the U.S. Trustee
833 Chestnut Street, Suite 500
Philadelphia, PA 19107

Date: June 16, 2017

/s/ Joel S. Todd, Esquire
Joel S. Todd, Esquire
Shelton, Harrison & Pinson, PLLC
212 West Gay Street
West Chester, PA 19380
P: 484.483.4957

*Attorney for Wilmington Savings Fund Society,
FSB, as Trustee of Stanwich Mortgage Loan
Trust A*